

BEFORE THE  
FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION  
COMMISSION

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American Democracy Legal Fund  
455 Massachusetts Avenue, N.W.  
Washington, DC 20001

Complainant,

v.

**MUR # 6888**

Republican National Committee  
310 First Street, SE  
Washington, DC 20003

American Crossroads  
P.O. Box 34414  
Washington, DC 20043

Crossroads GPS  
P.O. Box 34413  
Washington, DC 20043

Americans for Prosperity  
2111 Wilson Blvd, Suite #350  
Arlington, VA 22201

GOP Data Trust LLC  
735 8th Street SE, Suite #200  
Washington, DC 20003

i360, LLC  
2300 Clarendon Blvd, Suite #800  
Arlington, VA 22201

Arizona Republican Party  
Timothy Lee, Treasurer  
3501 North 24th Street  
Phoenix, AZ 85016

Montana Republican State Central Committee  
Debra Brown, Treasurer  
PO Box 935  
Helena, MT 59624

1807-1004-1-001

West Virginia Republican Party, Inc.  
Michelle Wilshire, Treasurer  
700 Washington Street – East Suite 201  
Charleston, WV 25301

Andrew Walter  
Andrew Walter for Congress  
Chris Marston, Treasurer  
PO Box 13321  
Tempe, AZ 85284

Ben Sasse  
Ben Sasse for US Senate Inc.  
Mark Fahleson, Treasurer  
105 East 6th Street  
Fremont, NE 68025

Bob Goodlatte  
Bob Goodlatte for Congress Committee  
Kenneth Lorenz Prickitt, Treasurer  
PO Box 292  
Roanoke, VA 24002

Bobby Schilling  
Bobby Schilling for Congress  
Mitch Heckenkam, Treasurer  
367 Avenue of the Cities – Suite D  
East Moline, IL 61244

Carl DeMaio  
Carl DeMaio for Congress  
Paul Kilgore, Treasurer  
PO Box 27227  
San Diego, CA 92198

Elizabeth Cheney  
Cheney for Wyoming  
Mark Vincent, Treasurer  
961 Recluse Ct  
Casper, WY 82609

Tom Cotton  
Cotton for Senate  
Bradley Crate, Treasurer  
PO Box 379  
Dardanelle, AR 72834

1-800-4-A-MO-1-7-8888

Doug Ose  
Doug Ose for Congress  
Vona Copp, Treasurer  
9321 Silverbend Lake  
Elk Grove, CA 95624

Elise Stefanik  
Elise for Congress  
James Morris, Treasurer  
PO Box 338  
Willsboro, NY 12996

Paul Dietzel  
Friends of Dietzel  
Brandon Lagarde, Treasurer  
PO Box 286  
Baton Rouge, LA 70821

Karen Handel  
Handel for Senate Inc.  
Roger Santi, Treasurer  
3970 Old Milton Parkway  
Alpharetta, GA 30005

William Hurd  
Hurd for Congress  
Bradley Crate  
PO Box 656  
Helotes, TX 78023

Steve Lonegan  
Lonegan for Senate Inc.  
Scott B. Mackenzie, Treasurer  
38 East Ridgewood Ave - Suite 181  
Ridgewood, NJ 07450

Lynn Jenkins  
Lynn Jenkins for Congress, Inc.  
Heather Grote, Treasurer  
PO Box 1441  
Topeka, KS 66601

Matt Rosendale  
Matt Rosendale for Montana  
Bill Vancanagan, Treasurer  
1954 Hwy. 16  
Glendive, MT 59330

Mike McFadden  
McFadden for Senate  
Paul Kilgore, Treasurer  
PO Box 4039  
Saint Paul, MN 55104

Martha McSally  
McSally for Congress  
James Thomas III, Treasurer  
PO Box 19128  
Tucson, AZ 85731

Mike Turner  
Mike Turner for Congress  
Kyle Walton Denham, Treasurer  
615 N. Hudson - Suite 320  
Oklahoma City, OK 73102

Rob Wittman  
Rob Wittman for Congress  
Steve Ralls, Treasurer  
PO Box 999  
Montross, VA 22520

Matt Schultz  
Schultz for Iowa  
David Overholtzer, Treasurer  
PO Box 3522  
Urbandale, IA 50323

Scott Rigell  
Scott Rigell for Congress  
Joseph B. Wood, Jr., Treasurer  
915 First Colonial Road - Suite 100  
Virginia Beach, VA 23454

13984361700

Steve Daines  
Steve Daines for Montana  
Lorna Kuney, Treasurer  
PO Box 1598  
Helena, MT 59624

Dan Sullivan  
Sullivan for US Senate  
Eric Campbell, Treasurer  
3705 Arctic Blvd. #447  
Anchorage, AK 99503

Tom Reed  
Tom Reed for Congress  
Marc Valerio, Treasurer  
PO Box 10847  
Rochester, NY 14610

Jeb Bush  
Jeb 2016, Inc.  
William Simon, Treasurer  
PO Box 440669  
Miami, FL 33144

Scott Walker  
Scott Walker, Inc.  
Kate Lind, Treasurer  
PO Box 620590  
Middleton, WI 53562

Ted Cruz  
Cruz for President  
Bradley S. Knippa, Treasurer  
PO Box 25376  
Houston, TX 77265

Marco Rubio  
Marco Rubio for President  
Lisa Lisker, Treasurer  
PO Box 558701  
Miami, FL 33255-8701

119716144061

Chris Christie  
Chris Christie for President, Inc.  
Ronald Gravino, Treasurer  
PO Box 225  
Colonia, NJ 07067-0225

Bobby Jindal  
Jindal for President  
Rolfe McCollister, Jr., Treasurer  
PO Box 5101  
Baton Rouge, LA 70821

Rick Perry  
Perry for President, Inc.  
Dr. Richard Box, Treasurer  
PO Box 162406  
Austin, TX 78716

Rick Santorum  
Santorum for President 2016  
Greg Rothman, Treasurer  
PO Box 238  
Verona, PA 15147

Mike Huckabee  
Huckabee for President, Inc.  
Cale Turner, Treasurer  
PO Box 3357  
Little Rock, AR 72203

Ben Carson  
Carson America  
Logan D. Delany, Jr., Treasurer  
1800 Diagonal Rd., Suite 140  
Alexandria, VA 22314

Carly Fiorina  
Carly for President  
Joseph R. Schmuckler, Treasurer  
1020 N. Fairfax St., Suite 200  
Alexandria, VA 22314

NRSC  
Keith A. Davis, Treasurer  
425 2nd Street NE  
Washington, DC 20002

16044361762

Massachusetts Republican Party  
Brent T. Andersen, Treasurer  
85 Merrimac St., Suite 400  
Boston, MA 02114

Pat Roberts  
Pat Roberts for U.S. Senate  
Richard A. Ball, Treasurer  
PO Box 433  
Great Bend, KS 67530

Lisa Murkowski  
Lisa Murkowski for U.S. Senate  
Catherin Straub, Treasurer  
PO Box 100847  
Anchorage, AK 99510

John Isakson  
Georgians for Isakson  
Jon Anderson, Treasurer  
PO Box 250116  
Atlanta, GA 30325

Dr. Charles Boustany Jr.  
Charles Boustany Jr. MD for Congress, Inc.  
Alan D. Hebert, Treasurer  
PO Box 80126  
Lafayette, LA 70598-0216

Rob Portman  
Portman for Senate Committee  
Natalie K. Baur, Treasurer  
9856 Archer Lane  
Dublin, OH 43017-8914

Patrick Toomey  
Friends of Pat Toomey  
Lisa Lisker, Treasurer  
228 S Washington St, Suite 115  
Alexandria, VA 22314

1-800-4-A-MON

Kelly Ayotte  
Friends of Kelly Ayotte, Inc.  
Theodore V. Koch, Treasurer  
PO Box 937  
Manchester, NH 03105-0937

Renee Ellmers  
Renee Ellmers for Congress Committee  
Al Lytton, Treasurer  
PO Box 99567  
Raleigh, NC 27624

Kevin Yoder  
Yoder for Congress, Inc.  
Donald Kaiser, Treasurer  
PO Box 26742  
Overland Park, KS 66225-6742

Kristi Noem  
Kristi for Congress  
Ted Hustead, Treasurer  
PO Box 852  
Sioux Falls, SD 57101

Morgan Griffith  
Morgan Griffith for Congress  
John Selph, Treasurer  
PO Box 361  
Christiansburg, VA 24068

Alan Sanborn  
Sanborn for Congress  
Ralph Maccarone, Treasurer  
PO Box 182004  
Shelby Twp, MI 48318-2004

Freedom Partners Action Fund, Inc.  
Thomas F Maxwell III, Treasurer  
1515 Courthouse Rd, Suite 620  
Arlington, VA 22201

Respondents.

4071-109140001



## **SECOND SUPPLEMENTAL COMPLAINT**

The American Democracy Legal Fund files this second supplemental complaint with the Federal Election Commission (the "FEC" or "Commission") under 52 U.S.C. § 30109(a)(1) against the above named respondents (collectively "Respondents") for additional and ongoing violations of the Federal Election Campaign Act of 1971, as amended (the "Act"). This complaint supplements a complaint submitted to the Commission on October 14, 2014, and a second, related complaint filed on October 28, 2014, regarding millions of dollars in illegal "coordinated communications" facilitated through the ongoing, real-time exchange of non-public strategic campaign and party data with groups making purportedly "independent" expenditures (the "Complaint" and "Supplemental Complaint," respectively).

New facts reveal that Respondents' violations such as making and receiving excessive, multi-million dollar contributions are not only ongoing, but are being perpetrated by an even greater number of Republican candidates than previously realized. Moreover, at least eleven Republican candidates for President of the United States are now involved in the scheme to skirt the Commission's "coordinated communication" regulations by passing their most valuable data to outside organizations via the GOP Data Trust and the Koch brothers' data firm i360.

The Commission must immediately investigate these violations and enjoin any further illegal activity.

### **Factual and Legal Background**

As detailed in the Complaint and Supplemental Complaint, there are two primary companies that manage voter data for the Republican Party, Republican candidates, and the supposedly "independent" outside groups that support the party and its candidates: the GOP Data Trust, a for-profit entity created by the Republican National Committee ("RNC"); and i360, a

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data management firm managed by the Koch brothers' Freedom Partners network of organizations. Together, these companies maintain a master file of conservative voters. Party committees, candidate committees and outside organizations upload their strategic voter data into the Data Trust and/or i360 systems for analysis, refinement, and use in creating and distributing public communications and other campaign activities. Moreover, each client of either company receives the benefit of all other clients' insider information: the two data companies have brazenly admitted on the public record that they not only share critical voter data between companies, but that each also provides technology that allows their party and candidate clients to send voter data in real time to other clients. These other clients – which are supposedly independent outside organizations – then spend tens of millions of dollars on public communications supporting the very same candidates who feed the critical, real-time voter information into the system.

The Commission's regulations explain that an expenditure for a communication will be considered an in-kind contribution to a campaign or party if it is (1) paid for by an entity other than the party, candidate or candidate's campaign; (2) meets certain content standards, including by being a public communication that expressly advocates the election or defeat of a clearly identified candidate; and (3) meets certain conduct standards, including the payor and the candidate, the candidate's opponent, or a political party using a common vendor.<sup>1</sup> The "common vendor" standard is satisfied if the payor uses a particular vendor to create, produce or distribute a communication;<sup>2</sup> when that vendor has provided certain specific services to the candidate identified in the communication, that candidate's opponent, or a political party during the

<sup>1</sup> See 11 C.F.R. §§ 109.21(a), (c)(3), (d)(4).

<sup>2</sup> See *id.* § 109.21(d)(4)(i).

previous 120 days, including "identifying voters or developing lists";<sup>3</sup> and the vendor then uses or conveys to the payor material information about the candidate's or the political party's plans, projects, activities, or needs, or information used previously in providing services to the candidate or the political party.<sup>4</sup>

As a result of the arrangement between Data Trust and i360 and the real-time data sharing technology each provides, each and every time an outside group pays for a public communication that expressly advocates the election or defeat of any of a clearly identified candidate, or mentions a clearly identified candidate, their opponent, or the Democratic or Republican parties in a communication airing within the relevant candidate's or party's jurisdiction within 120 days of an election, all three components of the Commission's "common vendor" test for coordinated communications are satisfied.<sup>5</sup> Stated plainly, both the Data Trust and i360 are in blatant violation of Commission regulations and have made tens of millions of dollars of illegal in-kind contributions to Republican candidates. Moreover, recent news articles and reports filed with the Commission prove that these violations are ongoing, and are being perpetrated by an even broader number of Republican candidates, party committees and Koch-affiliated conservative groups than previously thought, including at least eleven candidates who are currently seeking the Republican Party's nomination for President of the United States.

#### **Additional and Ongoing Violations**

Reports filed with the Commission prove that the Koch brothers-affiliated Americans for Prosperity ("AFP") and Freedom Partners Action Fund ("Freedom Partners") paid i360 and other vendors tens of millions of dollars to run public communications supporting Republican candidates and opposing Democratic candidates in the final weeks of the 2014 midterm

<sup>3</sup> See *id.* § 109.21(d)(4)(ii)(G) (emphasis added).

<sup>4</sup> See *id.* §§ 109.21(d)(4)(iii)(A), (B).

<sup>5</sup> See *id.* § 109.21(d)(4).

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elections. A list of AFP's \$1,164,787 of disbursements to i360 in 2014 is attached as Exhibit I, and a list of Freedom Partner's \$22,805,221 of disbursements to i360 in 2014 is attached as Exhibit II. AFP and Freedom Partners made disbursements to i360 for such purposes as "Media Placement: Broadcast Cable Satellite" and "Web Ad Placement" for communications supporting some of the very same candidates (or opposing their opponents) who made disbursements to i360 or the Data Trust for such purposes as "voter contact database subscriptions" and "list acquisition."<sup>6</sup> The result is a near-textbook violation of the Commission's common vendor coordinated communication rule: AFP and Freedom Partners paid i360 to create, produce or distribute public communications supporting Republican candidates at the same time i360 was developing voter lists for these same candidates, all while i360's technology conveyed material information about the candidate's voter lists and other activities to AFP and Freedom Partners.

The facts indicate these violations are ongoing. According to news reports containing on-the-record quotations from named sources in the Republican Party, the Data Trust and i360 have "stuck a new deal to share voter data in the 2016 cycle . . . ."<sup>7</sup> In other words, any Republican on the ballot in 2016 who enters into a data agreement with either the Data Trust or i360 is poised to receive the benefit of tens or perhaps hundreds of millions of dollars of coordinated, in-kind spending from AFP, Freedom Partners, and others. Operatives of i360 have confirmed that the company's technology has "made major advances" in its ability to share and receive critical voter data in real time, ensuring that i360's clients are always using the most up-to-date voter data obtained directly from candidates when they create public communications supporting those

<sup>6</sup> See Supplemental Complaint at 7.

<sup>7</sup> Matea Gold, *Koch Network Strikes New Deal to Share Voter Data with RNC-Aligned Firm*, The Washington Post (July 29, 2015), available at <http://www.washingtonpost.com/news/post-politics/wp/2015/07/29/koch-network-strikes-new-deal-to-share-voter-data-with-rnc-aligned-firm/>.

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candidates.<sup>8</sup> Senior RNC official Katie Walsh went on the record with the media to say that this integrated data sharing operation is a “huge help” because there is “value to making sure [the party and the Koch-affiliated organizations are] all working together . . . .”<sup>9</sup> It appears that Republican candidates, i360 and other Respondents “all working together” constitutes coordinated communications and excessive contributions in ongoing violation of the Commission’s “common vendor” rule.

Moreover, an even greater number of Republican party committees and candidates that previously thought will benefit from this ongoing violation of Commission regulations. Reports filed with the Commission and published in the media reveal twenty-six additional candidates and committees who have either (a) entered into agreements with the Data Trust, i360, or both to obtain and manager their voter data; or (b) made disbursements to i360 to create public communications aiding Republican candidates.<sup>10</sup> Exhibit III to this Second Supplemental Complaint details the committees not previously named as Respondents that have made operating expenditures to i360 thus far in 2015, as well as additional payments made in 2015 by previously-named Respondents. Additionally, according to to press reports, eleven authorized committees of Republican Presidential candidates have also entered into agreements with the Data Trust, i360, or both.<sup>11</sup> These candidates are also named as Respondents. These reports and the public statements made by i360 and the RNC regarding the technology that *automatically*

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<sup>8</sup> See *id.*

<sup>9</sup> *Id.*

<sup>10</sup> See Exhibit III.

<sup>11</sup> See Sasha Issenberg, Why Isn’t Rand Paul Making a Data Deal with the GOP?, Bloomberg Politics (July 24, 2015), available at <http://www.bloomberg.com/politics/articles/2015-07-24/why-isn-t-rand-paul-making-a-data-deal-with-the-gop>. According to RNC officials, eleven candidates have entered into data agreements with the GOP Data Trust. See *id.*; see also Gold, *supra* note 7. RNC officials identified Donald Trump, Senator Lindsey Graham, former New York Governor George Pataki, and former Virginia Governor Jim Gilmore as the major Republican candidates who have not entered into such agreements. The remaining candidates who have apparently retained the Data Trust and therefore are passing their critical voter data to i360 and i360’s outside organization clients are named as Respondents.

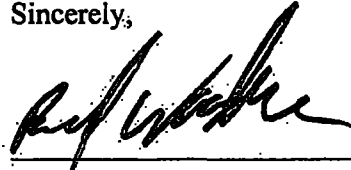
passes material information about the committees' activities to any and all outside groups is further proof of an ongoing violation of the Commission's coordinated communication rule that could amount to tens or hundreds of millions of dollars in excessive in-kind contributions in the 2016 cycle.

### **Conclusion**

In sum, the Data Trust, i360, and the other Respondents have created the exact opposite of a common vendor's safe harbor firewall: they have created a data sharing information superhighway between Republican candidates and the outside groups that they are prohibited from coordinating with. We therefore respectfully request that the Commission immediately investigate the Respondents, the transactions detailed above and in the Exhibits, and any other clients of Data Trust and i360 to determine whether – as seems clear – they are continuing to engage in a massive scheme to flaunt the Commission's ban on coordinated communications. The Commission should determine the extent to which excessive contributions have been made in the form of past coordinated communications; should enjoin Respondents from further violations of the Act contemplated under the renewed data sharing agreement between Data Trust and i360; and should assign the maximum fines permitted by law.

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Sincerely,



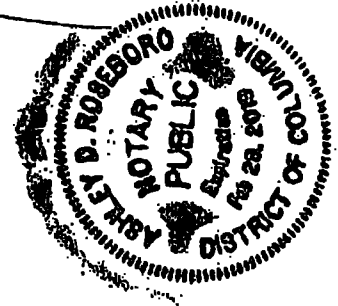
Brad Woodhouse, Treasurer

SUBSCRIBED AND SWORN to before me this 18 day of August, 2015.

  
Notary Public

My Commission Expires:

2/28/2019



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### Disbursements to i360 for Independent Expenditures

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OFFICE OF  
CITY



## Exhibit II

### FREEDOM PARTNERS ACTION FUND INC Disbursements to i360 for Independent Expenditures

Payee Name	Disbursement Date	Amount	Purpose	FEC Image Number
i360	8/29/2014	\$221,307.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290467
i360	8/29/2014	\$209,750.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290468
i360	8/29/2014	\$279,860.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290468
i360	8/29/2014	\$315,399.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290470
i360	9/4/2014	\$288,080.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290469
i360	9/4/2014	\$405,384.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290469
i360	9/4/2014	\$366,800.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290470
i360	9/4/2014	\$94,850.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290471
i360	9/11/2014	\$315,474.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290471
i360	9/11/2014	\$405,509.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290472
i360	9/11/2014	\$366,800.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290472
i360	9/11/2014	\$288,080.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290473
i360	9/11/2014	\$94,850.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290473
i360	9/11/2014	\$323,550.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290474
i360	9/11/2014	\$382,025.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290474
i360	9/18/2014	\$328,800.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290475
i360	9/18/2014	\$212,480.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290475
i360	9/18/2014	\$84,850.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290476
i360	9/18/2014	\$323,550.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290476
i360	9/18/2014	\$382,025.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290477
i360	9/18/2014	\$290,474.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290477
i360	9/18/2014	\$389,611.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290478
i360	9/18/2014	\$243,450.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290478
i360	9/26/2014	\$51,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290479
i360	9/26/2014	\$131,400.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290479
i360	9/26/2014	\$389,674.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290480
i360	9/26/2014	\$471,161.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14978290480
i360	9/26/2014	\$258,700.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290481
i360	9/26/2014	\$99,650.00	MEDIA PLACEMENT - BROADCAST/CABLE	14978290481
i360	10/2/2014	\$457,707.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424437
i360	10/2/2014	\$471,161.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424437
i360	10/2/2014	\$701,595.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424438
i360	10/2/2014	\$131,400.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424438
i360	10/2/2014	\$51,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424439
i360	10/2/2014	\$99,650.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424439

14952424439

## Exhibit II

### FREEDOM PARTNERS ACTION FUND INC Disbursements to i360 for Independent Expenditures

Payee Name	Disbursement Date	Amount	Purpose	FEC Image Number
i360	10/2/2014	\$258,700.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424440
i360	10/6/2014	\$125,050.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424440
i360	10/8/2014	\$200.00	MEDIA PLACEMENT - SATELLITE	14952424441
i360	10/9/2014	\$97.00	MEDIA PLACEMENT - SATELLITE	14952424441
i360	10/10/2014	\$81,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424442
i360	10/10/2014	\$51,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424442
i360	10/10/2014	\$131,400.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424443
i360	10/10/2014	\$611,267.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424443
i360	10/10/2014	\$665,536.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424444
i360	10/10/2014	\$701,595.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952424444
i360	10/10/2014	\$146,050.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424445
i360	10/10/2014	\$581,949.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952424445
i360	10/16/2014	\$611,267.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884966
i360	10/16/2014	\$665,536.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884966
i360	10/16/2014	\$1,041,970.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884967
i360	10/16/2014	\$131,400.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884967
i360	10/16/2014	\$51,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884968
i360	10/16/2014	\$146,050.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884968
i360	10/16/2014	\$581,524.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884969
i360	10/16/2014	\$60,000.00	MEDIA PLACEMENT - DIGITAL	14952884969
i360	10/16/2014	\$1,051,925.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884970
i360	10/20/2014	\$19,439.00	PHONE CALLS - SEE FEC-961676 AND 963014	14952884970
i360	10/21/2014	\$200.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884971
i360	10/21/2014	\$34,642.00	MEDIA PLACEMENT - DIGITAL	14952884971
i360	10/23/2014	\$100,000.00	MEDIA PLACEMENT - BROADCAST/CABLE/RADIO	14952884972
i360	10/23/2014	\$611,259.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884972
i360	10/23/2014	\$665,536.00	MEDIA PLACEMENT - BROADCAST/CABLE/SATELLITE	14952884973
i360	10/23/2014	\$69,495.00	MEDIA PLACEMENT - SATELLITE	14952884973
i360	10/23/2014	\$131,400.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884974
i360	10/23/2014	\$51,950.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884974
i360	10/23/2014	\$146,050.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884975
i360	10/23/2014	\$612,533.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884975
i360	10/23/2014	\$581,524.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884976
i360	10/23/2014	\$118,500.00	MEDIA PLACEMENT - RADIO	14952884976
i360	10/28/2014	\$120,050.00	MEDIA PLACEMENT - RADIO	14952884977

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## Exhibit II

### FREEDOM PARTNERS ACTION FUND INC

Disbursements to i360 for Independent Expenditures

Payee Name	Disbursement Date	Amount	Purpose	FEC Image Number
i360	10/28/2014	\$400,613.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884977
i360	11/7/2014	\$399,034.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884978
i360	11/10/2014	\$84,196.00	PHONE CALLS - SEE FEC-970493 AND 972831	14952884978
i360	11/10/2014	\$15,572.00	PHONE CALLS - SEE FEC-970483 AND 972830	14952884979
i360	11/10/2014	\$7,433.00	PHONE CALLS - SEE FEC-970441 AND 972835	14952884979
i360	11/10/2014	\$15,097.00	PHONE CALLS - SEE FEC-972248 AND 972847	14952884980
i360	11/13/2014	\$400,812.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884980
i360	11/19/2014	\$400,014.00	MEDIA PLACEMENT - BROADCAST/CABLE	14952884981
i360	11/25/2014	\$193,550.00	MEDIA PLACEMENT - BROADCAST/CABLE	15950532268
		<b>\$22,805,221.00</b>		

# Exhibit III

## Operating Expenditures to i360

Committee	Payee Name	Disbursement Date	Amount	Purpose	FEC Image Number
BEN SASSE FOR US SENATE INC	i360, LLC	2/10/2015	\$ 900.00	DATA SUBSCRIPTION	15020127564
BEN SASSE FOR US SENATE INC	i360, LLC	3/10/2015	\$ 300.00	DATA SUBSCRIPTION	15020127564
BEN SASSE FOR US SENATE INC	i360, LLC	4/28/2015	\$ 300.00	DATA SUBSCRIPTION	2.01507E+17
BEN SASSE FOR US SENATE INC	i360, LLC	5/1/2015	\$ 300.00	DATA SUBSCRIPTION	2.01507E+17
BEN SASSE FOR US SENATE INC	i360, LLC	6/8/2015	\$ 300.00	DATA SUBSCRIPTION	2.01507E+17
CHARLES BOUSTANY JR. MD FOR CONGRESS, INC.	i360	2/12/2015	\$ 2,000.00	WEB HOSTING FEE	15970349928
CHARLES BOUSTANY JR. MD FOR CONGRESS, INC.	i360	3/17/2015	\$ 1,000.00	WEB HOSTING FEE	15970349965
CHARLES BOUSTANY JR. MD FOR CONGRESS, INC.	i360	4/17/2015	\$ 1,000.00	WEB HOSTING FEE	2.01507E+17
CHARLES BOUSTANY JR. MD FOR CONGRESS, INC.	i360	5/15/2015	\$ 1,000.00	SUBSCRIPTION RENEWAL	2.01507E+17
CHARLES BOUSTANY JR. MD FOR CONGRESS, INC.	i360	6/22/2015	\$ 1,000.00	SOFTWARE SERVICE	2.01507E+17
ELISE FOR CONGRESS	i360 LLC	2/28/2015	\$ 1,050.00	SUBSCRIPTIONS	15951164129
ELISE FOR CONGRESS	i360 LLC	5/2/2015	\$ 200.00	WEB SERVICE	2.01507E+17
ELISE FOR CONGRESS	i360 LLC	5/8/2015	\$ 200.00	SUBSCRIPTIONS	2.01507E+17
ELISE FOR CONGRESS	i360 LLC	6/17/2015	\$ 550.00	SUBSCRIPTIONS	2.01507E+17
FRIENDS OF KELLY AYOTTE INC	i360, LLC	1/15/2015	\$ 100.00	DATA SERVICES	15020135376
FRIENDS OF KELLY AYOTTE INC	i360, LLC	1/29/2015	\$ 350.00	DATA SERVICES	15020135379
FRIENDS OF KELLY AYOTTE INC	i360, LLC	3/11/2015	\$ 100.00	DATA SERVICES	15020135332
FRIENDS OF KELLY AYOTTE INC	i360, LLC	6/1/2015	\$ 200.00	DATA SERVICES	2.01507E+17
FRIENDS OF KELLY AYOTTE INC	i360, LLC	6/1/2015	\$ 100.00	DATA SERVICES	2.01507E+17
FRIENDS OF PAT TOOMEY	i360	4/7/2015	\$ 2,000.00	DATA SERVICES	2.01507E+17
FRIENDS OF PAT TOOMEY	i360	5/13/2015	\$ 1,000.00	DATA SERVICES	2.01507E+17
FRIENDS OF PAT TOOMEY	i360	6/11/2015	\$ 1,000.00	DATA SERVICES	2.01507E+17
GEORGIANS FOR ISAKSON	i360	4/2/2015	\$ 1,000.00	COMPUTER SUPPORT	2.01507E+17
GEORGIANS FOR ISAKSON	i360	4/2/2015	\$ 2,000.00	COMPUTER SUPPORT	2.01507E+17
GEORGIANS FOR ISAKSON	i360	5/1/2015	\$ 1,000.00	COMPUTER SUPPORT	2.01507E+17
GEORGIANS FOR ISAKSON	i360	6/3/2015	\$ 1,000.00	COMPUTER SUPPORT	2.01507E+17
KRISTI FOR CONGRESS	i360, LLC	1/6/2015	\$ 500.00	SUBSCRIPTION	15951144517
KRISTI FOR CONGRESS	i360, LLC	1/21/2015	\$ 500.00	SUBSCRIPTION	15951144518
KRISTI FOR CONGRESS	i360, LLC	2/17/2015	\$ 500.00	SUBSCRIPTION	15951144518
KRISTI FOR CONGRESS	i360, LLC	4/3/2015	\$ 500.00	SUBSCRIPTION	2.01507E+17
KRISTI FOR CONGRESS	i360, LLC	4/22/2015	\$ 500.00	SUBSCRIPTION	2.01507E+17
KRISTI FOR CONGRESS	i360, LLC	5/14/2015	\$ 500.00	SUBSCRIPTION	2.01507E+17
LISA MURKOWSKI FOR US SENATE	i360	5/4/2015	\$ 3,000.00	PORTAL SET UP & MONTHLY FEE	2.01507E+17
LISA MURKOWSKI FOR US SENATE	i360	5/26/2015	\$ 1,000.00	ONLINE SERVICE	2.01507E+17
LYNN JENKINS FOR CONGRESS	i360, LLC	3/3/2015	\$ 500.00	DATA SUBSCRIPTION	15971085996
LYNN JENKINS FOR CONGRESS	i360, LLC	4/1/2015	\$ 500.00	DATA SUBSCRIPTION	2.01507E+17
LYNN JENKINS FOR CONGRESS	i360, LLC	4/17/2015	\$ 500.00	DATA SUBSCRIPTION	2.01507E+17
LYNN JENKINS FOR CONGRESS	i360, LLC	5/17/2015	\$ 500.00	DATA SUBSCRIPTION	2.01507E+17
MASSACHUSETTS REPUBLICAN PARTY	i360	1/12/2015	\$ 516.13	ONLINE SUBSCRIPTION	15970305586
MASSACHUSETTS REPUBLICAN PARTY	i360	2/27/2015	\$ 1,000.00	ONLINE SUBSCRIPTION	15950885383
MASSACHUSETTS REPUBLICAN PARTY	i360	3/12/2015	\$ 1,000.00	ONLINE SUBSCRIPTION	15951196503
MASSACHUSETTS REPUBLICAN PARTY	i360	4/6/2015	\$ 1,000.00	ONLINE SUBSCRIPTION	15971081129
MASSACHUSETTS REPUBLICAN PARTY	i360	5/4/2015	\$ 1,000.00	ONLINE SUBSCRIPTIONS	15971219280

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### Exhibit III

#### Operating Expenditures to i360

Committee	Payee Name	Disbursement Date	Amount	Purpose	FEC Image Number
MASSACHUSETTS REPUBLICAN PARTY	i360	6/12/2015	\$ 1,081.06	ONLINE SUBSCRIPTION	2.01507E+17
MCFADDEN FOR SENATE	i360 LLC	2/6/2015	\$ 6,538.00	SOFTWARE	15020162623
MCSALLY FOR CONGRESS	i360, LLC	5/22/2015	\$ 519.40	DATABASE SOFTWARE	2.01507E+17
MCSALLY FOR CONGRESS	i360, LLC	5/22/2015	\$ 250.00	DATABASE SOFTWARE	2.01507E+17
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	1/12/2015	\$ 1,000.00	DATABASE SERVICES	15951151945
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	2/10/2015	\$ 1,000.00	DATABASE SERVICES	15951151945
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	3/10/2015	\$ 1,000.00	DATABASE SERVICES	15951151946
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	4/10/2015	\$ 1,000.00	DATABASE SERVICES	2.01507E+17
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	5/27/2015	\$ 1,000.00	DATABASE SERVICES	2.01507E+17
MORGAN GRIFFITH FOR CONGRESS	i360 LLC	6/15/2015	\$ 1,000.00	DATABASE SERVICES	2.01507E+17
NRSC	i360	1/28/2015	\$ 1,650.00	WEB SERVICE	15020106055
PAT ROBERTS FOR US SENATE INC	i360	6/30/2015	\$ 1,189.75	FULL DATA AND PORTAL SUBSCRIPTION, MINUTE	2.01507E+17
PORTMAN FOR SENATE COMMITTEE	i360	5/18/2015	\$ 8,671.68	DATA	2.01507E+17
RENEE ELLMERS FOR CONGRESS COMMITTEE	i360 LLC	6/10/2015	\$ 900.00	SOFTWARE	2.01507E+17
ROB WITTMAN FOR CONGRESS	i360 LLC	2/10/2015	\$ 1,000.00	WEBSITE HOSTING	15951163937
ROB WITTMAN FOR CONGRESS	i360 LLC	2/23/2015	\$ 504.53	WEBSITE HOSTING	15951163937
ROB WITTMAN FOR CONGRESS	i360 LLC	3/23/2015	\$ 500.00	WEBSITE HOSTING	15951163938
ROB WITTMAN FOR CONGRESS	i360 LLC	4/20/2015	\$ 500.00	WEBSITE HOSTING	2.01507E+17
ROB WITTMAN FOR CONGRESS	i360 LLC	5/15/2015	\$ 500.00	WEBSITE HOSTING	2.01507E+17
SANBORN FOR CONGRESS	i360, LLC	5/26/2015	\$ 1,000.00	VOTER PROFILES	2.01507E+17
STEVE DAINES FOR MONTANA	i360	1/13/2015	\$ 300.00	DATABASE DEVELOPMENT	15020171873
STEVE DAINES FOR MONTANA	i360	3/22/2015	\$ 600.00	DATA DEVELOPMENT	15020171880
STEVE DAINES FOR MONTANA	i360	5/6/2015	\$ 300.00	DATA DEVELOPMENT	2.01507E+17
STEVE DAINES FOR MONTANA	i360	6/17/2015	\$ 300.00	DATA DEVELOPMENT	2.01507E+17
STEVE DAINES FOR MONTANA	i360	6/30/2015	\$ 300.00	DATA DEVELOPMENT	2.01507E+17
SULLIVAN FOR US SENATE	i360, LLC	3/10/2015	\$ 1,227.50	DATA MANAGEMENT SERVICES	15020143191
TOM REED FOR CONGRESS	i360, LLC	4/1/2015	\$ 3,600.50	PORTAL SUBSCRIPTION & DIALER FEE	2.01507E+17
TOM REED FOR CONGRESS	i360, LLC	4/17/2015	\$ 250.00	PORTAL SUBSCRIPTION	2.01507E+17
TOM REED FOR CONGRESS	i360, LLC	5/8/2015	\$ 250.00	PORTAL SUBSCRIPTION	2.01507E+17
TOM REED FOR CONGRESS	i360, LLC	6/5/2015	\$ 250.00	PORTAL SUBSCRIPTION	2.01507E+17
WEST VIRGINIA REPUBLICAN PARTY, INC.	i360	4/17/2015	\$ 150.00	PORTAL SUBSCRIPTION	15951469215
WEST VIRGINIA REPUBLICAN PARTY, INC.	i360	5/2/2015	\$ 150.00	PORTAL SUBSCRIPTION	15951469301
WEST VIRGINIA REPUBLICAN PARTY, INC.	i360	6/12/2015	\$ 150.00	PORTAL SUBSCRIPTION	2.01507E+17
YODER FOR CONGRESS, INC	i360	1/9/2015	\$ 600.00	DATA STORAGE	15970346837
			\$ 72,698.55		

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